

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and the Estate  
of Bernard L. Madoff,

Plaintiff,

v.

RICHARD M. GLANTZ, et al.,

Defendants.

Adv. Pro. No. 10-05394 (SMB)

**STIPULATION AND ORDER EXTENDING TRUSTEE'S TIME TO  
MOVE TO STRIKE AFFIRMATIVE DEFENSES**

**WHEREAS**, on January 22, 2018, Irving H. Picard as trustee (the "Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq. ("SIPA"), and the substantively consolidated

chapter 7 estate of Bernard L. Madoff individually, filed the Second Amended Complaint in the above-captioned adversary proceeding; and

**WHEREAS**, on March 23, 2018, the defendants (“Defendants”) filed their Answer and Affirmative Defenses to the Second Amended Complaint;

**IT IS THEREFORE MUTUALLY AGREED AND STIPULATED**, by and between the Trustee and Defendants, that the time by which the Trustee may move to strike affirmative defenses is extended up to and including May 4, 2018.

The extension of time granted herein is without prejudice to any future extensions of time. Except as expressly set forth herein, the parties reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses.

This stipulation may be signed by the parties in any number of counterparts, each of which shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original.

*[signatures on next page]*

Dated: New York, New York  
April 12, 2018

**BAKER & HOSTETLER LLP**

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*Attorneys for Plaintiff Irving H. Picard,  
Trustee for the Substantively Consolidated  
SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate  
of Bernard L. Madoff*

**LAW OFFICE OF RICHARD E. SIGNORELLI**

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*Attorneys for Defendants RICHARD M. GLANTZ,  
individually, as trustee of the Glantz-Ostrin Trust  
II, as personal representative of the Estate of  
Edward R. Glantz, and as administrator of the  
Estate of Thelma Glantz; EJS ASSOCIATES, L.P.;  
JELRIS & ASSOCIATES, L.P.; GRACE &  
COMPANY; THE GLANTZ FAMILY  
FOUNDATION, INC; THE ESTATE OF EDWARD  
R. GLANTZ; LAKEVIEW INVESTMENT, LP;  
VISTA MANAGEMENT CO.; LAW &  
MEDIATION OFFICES OF RICHARD M.  
GLANTZ, A PROFESSIONAL CORPORATION;  
ELAINE OSTRIN; THE ESTATE OF THELMA  
GLANTZ; THE GLANTZ-OSTRIN TRUST II; and  
AUSTIN BOSARGE*

**SO ORDERED**

/s/ STUART M. NERNSTEIN

**HON. STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE**

**Dated: April 12, 2018  
New York, New York**